

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

**FILED**

FEB 01 2022

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY ka DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

WILLIAM SHAWN KAYS,

Defendant.

Case No.

**CR 22-040**

**D**

Violations: 18 U.S.C. § 922(n)  
18 U.S.C. § 924(d)  
28 U.S.C. § 2461(c)

**INDICTMENT**

The Federal Grand Jury charges:

**COUNT 1**

**(Illegal Receipt of a Firearm by a Person under Indictment)**

On or about August 15, 2021, in the Western District of Oklahoma,

----- **WILLIAM SHAWN KAYS,** -----

who was then under Indictment in Blaine County District Court case number CF-2021-52 for a crime punishable by a term of imprisonment exceeding one year, to wit: Burglary in the First Degree, in violation of Okla. Stat., Title 21, Section 1431, willfully received a firearm, to wit: a Glock GmbH, model 21Gen4, .45 ACP caliber pistol, bearing serial number VGA914, which was shipped or transported in interstate or foreign commerce in that said firearm had crossed state lines to reach the state of Oklahoma.

All in violation of Title 18, United States Code, Section 922(n), the penalty for which is found at Title 18, United States Code, Section 924(a)(1)(D).

**FORFEITURE**

The allegation contained in this Indictment is hereby re-alleged and incorporated for the purpose of alleging forfeiture.

Upon conviction of the offense alleged in Count 1 of this Indictment, **WILLIAM SHAWN KAYS** shall forfeit to the United States any and all firearms and/or ammunition involved in the commission of the offense.

The property subject to forfeiture includes, but is not limited to:

1. a Glock GmbH, model 21Gen4, .45 ACP caliber pistol, bearing serial number VGA914; and
2. any and all ammunition not specifically listed.

All pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

A handwritten signature in black ink, consisting of a large, stylized 'C' followed by a horizontal line extending to the right.

FOREPERSON OF THE GRAND JURY

ROBERT J. TROESTER  
United States Attorney

A handwritten signature in blue ink, appearing to read 'Mary E. Walters' in a cursive script.

MARY E. WALTERS  
Assistant United States Attorney